

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	CRIMINAL ACTION NO.
MICHAEL ROBATEAU,	)	04-10382-NG
	)	
Defendant.	)	

JOINT INITIAL STATUS CONFERENCE MEMORANDUM

The parties submit herewith a Joint Initial Status Conference Memorandum in the above-captioned matter:

1. Discovery is not complete. In the next day or so, the government anticipates being able to provide the defendant with complete information about the charges pending against, the criminal record of, and any promises, rewards, or inducements given to the cooperating witness in this case.

2. The parties agree that the government will provide expert witness discovery no less than thirty (30) days prior to a firm trial date and that the defendant will provide expert witness discovery no less than twenty-one (21) days prior to a firm trial date.

3. The parties do not anticipate providing additional discovery as a result of their future receipt of information, documents, or reports of examination or tests, other than the information identified in paragraph 1, above.

4. The defendant cannot determine at this time whether or not he will have any pre-trial motions. The parties, therefore,

request that an October 27, 2006 deadline be established for the filing of any such motions.

5. The twenty-eight-day period of time from the defendant's August 22, 2006 arraignment on the Indictment through September 20, 2006 constitutes excludable delay pursuant to Local Rule 112.2(A)(2). The parties also agree that the period of time until the deadline set by the Court for the filing of pre-trial motions by the defendant also constitutes excludable delay pursuant to 18 U.S.C. § 3161(h)(8)(A) insofar as the ends of justice served by allowing the defendant time to determine if he has any viable pre-trial motions to follow outweigh the best interest of the public and the defendant in a speedy trial.

6. A trial of this matter would take approximately three or four days.

7. The parties request that a Final Status Conference be scheduled for late October, 2006.

Respectfully submitted,

MICHAEL ROBATEAU  
By His Attorney

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UNITED STATES ATTORNEY

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Dated: September 20, 2006